

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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June 29, 2020

BY ECF AND EMAIL

Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square, Room 415
New York, New York 10007

**Re: United States v. Keenan Carroll
19 Cr. 488 (VSB)**

**APPLICATION GRANTED
SO ORDERED *Vern Brod*
VERNON S. BRODERICK
U.S.D.J. 6/30/2020**

Sentencing in this matter is hereby adjourned to
September 10, 2020 at 10 a.m.

Dear Judge Broderick:

I write to respectfully request an adjournment of Mr. Carroll's sentencing hearing which is currently scheduled for July 10, 2020. We seek an adjournment of approximately 60 days from that date. At our last conference before the Court, Kedar S. Bhatia, Esq., on behalf of the Government, expressed his objection to any further adjournment.

Mr. Carroll seeks an adjournment for the following reasons: (1) He hopes that his pending criminal case in state court can be addressed prior to sentencing so that this Court will be in a better position to consider how it may impact, if at all, his sentencing hearing; (2) Mr. Carroll hopes to continue both his drug counseling and psychological counseling which he feels is of great benefit to him; and (3) Mr. Carroll would like to personally address the Court at sentencing.

Under the CARES Act, Mr. Carroll's consent is necessary to proceed to sentencing in a manner other than personal appearance. For the reasons set forth above, he does not consent to waive his personal appearance. The CARES Act further requires that specific reasons must exist why the sentencing cannot be delayed without serious harm to the interests of justice. No such reasons exist.

Respectfully submitted,

/s/ Robert M. Baum
Robert M. Baum
Assistant Federal Defender

SO ORDERED:

HONORABLE VERNON S. BRODERICK
United States District Judge

cc: Kedar S. Bhatia, Esq.
Assistant United States Attorney